UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA

(ALEXANDRIA DIVISION)

ELIDA RIVAS &
DELIA GUTIERREZ

Plaintiffs,

v.

SALDIVAR & ASSOCIATES, INC., et al.,

Defendants

Case No: 1:16-CV-343-LMB-JFA

Date: September 1, 2016

Motion for Attorney's Fees and Costs

The FLSA allows prevailing plaintiffs to seek their costs and reasonable attorney's fees. 29 U.S.C. § 216(b). In its order granting Plaintiffs a default judgment, the Court instructed Plaintiffs to file an affidavit stating the fees and costs that they seek. (ECF No. 28). As described in the attached declaration, Plaintiffs have incurred \$15,744 in reasonable attorney's fees and \$1,266.07 in compensable costs. However, in agreement with Defendants, and in the exercise of billing discretion, Plaintiffs are seeking a total of \$15,000 in costs and fees combined.

Respectfully submitted,

By: <u>/s/ Nicholas Cooper Marritz</u>
Nicholas Cooper Marritz (VSB No. 89795)
LEGAL AID JUSTICE CENTER
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Tel: (703) 778-3450 x 607

Fax: (703) 778-3454 nicholas@justice4all.org Counsel for Plaintiffs

Certificate of Service

I certify that, on September 1, 2016, I sent a copy of this *Motion for Attorney's Fees and Costs* to all Defendants via U.S. mail at their last known addresses:

DEFENDANT	ADDRESS 1	ADDRESS 2	ADDRESS 3
Saldivar & Associates Inc. d/b/a R&R Catering Robert P. Saldivar, Registered Agent	8004-A Alban Rd. Springfield, Va. 22150	7956 Cameron Brown Ct. Springfield, Va. 22153	8721 Bitterooot Ct. Lorton, Va. 22079
Robert P. Saldivar	Saldivar & Associates Inc. d/b/a R&R Catering 8004-A Alban Rd. Springfield, Va. 22150	Saldivar & Associates Inc. d/b/a R&R Catering 7956 Cameron Brown Ct. Springfield, Va. 22153	8721 Bitterooot Ct. Lorton, Va. 22079
Michelle M. Bloxton	"Blu 1681" 13188 Marina Way Woodbridge, Va. 22191	6564 Manet Ct., Woodbridge, Va. 22193	

/s/ Nicholas Cooper Marritz
Nicholas Cooper Marritz (VSB No. 89795)
LEGAL AID JUSTICE CENTER
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Tel: (703) 778-3450 x 607

Fax: (703) 778-3454 nicholas@justice4all.org Counsel for Plaintiffs Date: September 1, 2016